

Docket NO. 12-292



DEPARTMENT OF JUSTICE

KENT COUNTY
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DOVER, DELAWARE 19904

DELAWARE P.S.C.

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Docket
Susan
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August 10, 2012

Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Re: In the Matter of the Application of Chesapeake Utilities Corporation for Approval
of Natural Gas Expansion Service Offerings; PSC Docket No. 12-292

To Whom It May Concern:

On behalf of the Department of Natural Resources and Environmental Control, please
find enclosed for filing the original and ten copies of the Department's petition to intervene in
the above-referenced matter. Thank you for your assistance in this matter.

Sincerely,

/s/ Ralph K. Durstein III

Ralph K. Durstein, III
Deputy Attorney General

Enclosure

cc: Service List
Collin O'Mara, Secretary
Thomas Noyes, DNREC
Environmental Unit

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION)	
OF CHESAPEAKE UTILITIES CORPORATION)	
FOR APPROVAL OF NATURAL GAS)	PSC DOCKET NO. 12-292
EXPANSION SERVICE OFFERINGS)	
(FILED JUNE 25, 2012))	

**PETITION OF THE DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL FOR LEAVE TO INTERVENE**

Pursuant to Rule 21 of the Rules of Practice and Procedure of the Delaware Public Service Commission (the "Commission"), the State of Delaware Department of Natural Resources and Environmental Control ("DNREC") hereby petitions the Commission for leave to intervene as a party in this matter.

In support of its petition for leave to intervene, DNREC states the following:

1. On June 25, 2012, Chesapeake Utilities Corporation filed an application with the Commission seeking approval of various natural gas expansion service offerings that, according to Chesapeake, would enable it to extend its natural gas distribution facilities in southeastern Sussex County more efficiently than would otherwise be practical under current tariff provisions. On July 3, 2012 the Commission approved Order No. 8174, which set August 10, 2012 as the deadline for filing petitions to intervene.

2. DNREC is an agency of the State of Delaware, created pursuant to 29 *Del. C.* § 8001, *et seq.* DNREC's mission "is to ensure the wise management, conservation, and

enhancement of the State's natural resources, protect public health and the environment, provide quality outdoor recreation, improve the quality of life and educate the public on historic, cultural, and natural resource use, requirements and issues."

3. DNREC's contact information, pursuant to Rule 21(i) of the Commission's Rules of Practice and Procedure, is as follows:

Thomas G. Noyes
Division of Energy & Climate
Delaware Department of Natural Resources and Environmental Control
1203 College Park Drive, Suite 101
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4. DNREC's interest in the outcome of this proceeding is in promoting the expanded use of potentially cleaner fuels, where environmentally beneficial and economically feasible.

5. DNREC's interest will not be adequately represented by any of the other parties to this proceeding. DNREC has the responsibility for the management of Delaware's environment. No other participant in this proceeding has the same obligation to protect Delaware's environment. Nor does any other participant in this proceeding bring to bear the expertise that DNREC can employ in considering the effects of expansion of natural gas service on environmental quality.

6. DNREC's participation in the proceeding would be in the public interest. The

public relies upon DNREC to provide guidance and expertise in evaluating the environmental impacts of expanding the use of natural gas in Delaware. As a public agency, DNREC has no private interest in the outcome of the proceeding.

7. For the foregoing reasons, DNREC respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,

/s/ Ralph K. Durstein III

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Attorney for the Department of Natural
Resources and Environmental Control

Dated: August 10, 2012

CERTIFICATE OF SERVICE

I, Ralph K. Durstein, III, do hereby certify that true and correct copies of the Petition for Leave to Intervene of the Department of Natural Resources and Environmental Control were served to the service list attached by electronic mail on August 10, 2012.

Respectfully submitted,

/s/ Ralph K. Durstein III

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